

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 4:24-CV-10017-MARTINEZ/SANCHEZ

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

vs.

MMI 82, LLC and
THE ENTHUSIAST LLC,

Defendants.

DECLARATION OF ONEIL KHOSA

I, Oneil Khosa, declare as follows:

1. I am over the age of eighteen and competent to make this declaration.
2. I am a Manager and Member of MMI 82, LLC (“MMI”),
3. I am the sole member of The Enthusiast LLC (“Enthusiast”), and have personal knowledge of the facts stated herein.
4. MMI is not a member of and has no ownership interest in Enthusiast.
5. Enthusiast is not a member of and has no ownership interest in MMI.
6. Enthusiast has no office, no bank account, no assets, and no employees and was solely created for the purpose of creating a unified brand name for affiliated hotels.
7. MMI is the sole owner of and operates the Casa Morada Hotel located at 136 Madeira Rd, Islamorada, Florida 33036 (the “Hotel”).

8. As a Manager and Member of MMI, I have personal knowledge of the operations and supervision of the Hotel.

9. Enthusiast never had any operational or managerial control over MMI, the Hotel, or the Hotel's employees, and did not directly or indirectly employ the Hotel's employees.

10. Daniella Rodriguez was the General Manager of the Hotel from around December 2023 to August 2024.

11. Ms. Rodriguez had no hotel management experience prior to being hired as General Manager.

12. Unfortunately, her lack of experience was apparent throughout her tenure. I personally spoke to Ms. Rodriguez on several occasions about her poor job performance.

13. Ms. Rodriguez was terminated from her position in August 2024 due to her poor performance and for her responsibility in losing my Rolex watch, which was sentimental to me.

14. A police report was filed in connection with the lost watch. A copy of the police report is attached hereto as **Exhibit 1**.

15. I have never, nor any other representative of MMI at my direction, instructed Ms. Rodriguez to destroy any documents in connection with any pending litigation or government investigation.

16. Furthermore, at the time of Ms. Rodriguez's termination from the Hotel, I never instructed anyone to throw out anything that was in her room.

Under penalty of perjury, I declare that I have read the foregoing document and that the facts stated in it are true to the best of my knowledge and belief.

Dated: June 24, 2025.

A handwritten signature in black ink, appearing to read 'Oneil Khosa', written above a horizontal line.

Oneil Khosa

EXHIBIT 1

OFFICE OF THE SHERIFF
MONROE COUNTY, FLORIDA

Incident #

Date

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STATEMENT FORM

NAME Chris KHOSA DATE OF BIRTH 07 27 1974
FIRST MIDDLE LAST MONTH DAY YEAR

ADDRESS 17710 CADENA DR BOCA RATON FL 33496
STREET CITY STATE ZIP

BUSINESS ADDRESS MADEIRA ROAD ISLAMORADA FL 33065
STREET CITY STATE ZIP

TELEPHONES (561 818 8304) () OTHER
HOME BUSINESS

PLEASE PRINT LEGIBLY.

I hereby state the following:

MY ROLEX WATCH (ROLEX GMT-MASTER II) GOT LEFT
AT CASA MORADA HOTEL. HOUSEKEEPER FOUND IT
AND I ADVISED THEM I WILL COME AND GET IT IN A
FEW WEEKS AS I WAS TRAVELING. THEY CONFIRMED
THEY HAD THE WATCH AND WILL BE KEPT SAFELY.

THE MANAGER PUT IT IN A ROOM THAT IS LOCKED AND
SHE WAS THE ONLY ONE WITH ACCESS TO THAT ROOM.
HOWEVER, AS PER HER, SHE ALSO LEFT THE DOOR OPEN
FEW TIMES TO ALLOW FOR SUPPLIES AND VENDORS TO
BRING IN STUFF. WHEN I CAME TO COLLECT THE WATCH
WE COULD NOT FIND IT. THE MANAGER CLAIMS, SHE
STORED IT SAFELY AND NOW CANNOT FIND IT AND
MY WATCH HAS BEEN LOST.

I have read each page of this statement consisting of 1 page(s) and I swear or affirm that it is true to the best of my
knowledge or belief

Signed

Date

Date

Notary Public or Officer Authorized to Administer an Oath

OPS10.03/97